

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE CHICAGO PAINTERS)	
AND DECORATORS PENSION FUND,)	
TRUSTEES OF THE CHICAGO PAINTERS)	
AND DECORATORS HEALTH AND)	
WELFARE FUND, TRUSTEES OF THE)	
CHICAGO PAINTERS AND DECORATORS)	
DEFERRED SAVINGS FUND, TRUSTEES OF)	
THE CHICAGO PAINTERS AND)	
DECORATORS APPRENTICESHIP FUND,)	
TRUSTEES OF THE CHICAGO PAINTERS)	
AND DECORATORS SCHOLARSHIP FUND,)	
AND TRUSTEES OF THE CHICAGO)	
PAINTERS AND DECORATORS JOINT)	
COOPERATION TRUST FUND,)	
)	
Plaintiffs,)	No. 14 C 2610
)	
)	Judge Dow, Jr.
)	
v.)	Magistrate Judge Cox
)	
ALCA, INC., an Illinois Corporation)	
)	
Defendant.)	

PLAINTIFFS' MOTION
FOR JUDGMENT IN A SUM CERTAIN

Plaintiffs, by and through their attorneys, DONALD D. SCHWARTZ, JAMES R. ANDERSON, GRANT R. PIECHOCINSKI, and ARNOLD AND KADJAN, pursuant to Federal Rule of Civil Procedure 55, move this Court to enter judgment in a sum certain in favor of the Plaintiffs and against the Defendant , Alca, Inc., an Illinois corporation. In support of their Motion, the Plaintiffs state as follows:

1. The Defendant was defaulted by order of this Court dated June 30, 2015 which required him to produce books and records for a fringe benefit fund contribution

compliance audit for the period from January 1, 2013 through the present.

2. According to the Affidavit of Richard Wolf, which is attached hereto as Exhibit 1, Defendant Alca, Inc. was audited for the period from January 1, 2013 through June 30, 2015. According to Mr. Wolf's affidavit, Alca, Inc. owes **\$10,068.99**, to the Plaintiffs, consisting of \$4,537.73 in contributions, \$680.65 for liquidated damages, \$902.50 for audit costs, and \$3,948.11 for prior unpaid liquidated damages. This amount does not include any attorneys' fees or costs.

WHEREFORE, Plaintiffs pray that this Court grant the following relief:

A. Enter final judgment in favor of Plaintiffs and against the Defendant Alca, Inc. in the amount of \$10,068.99. (A proposed judgment order is attached as Exhibit 2, and is being sent via the Court's email system).

Respectfully submitted,

s/s James R. Anderson
One of Plaintiffs' attorneys

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